1	ILLINOIS COMMERCE COMMISSION		
2	DOCKET NO. 06-0179		
3		DIRECT TESTIMONY OF	
4		ON BEHALF OF	
5	II	NTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS,	
6		AFL-CIO	
7			
8		INTRODUCTION	
9			
10	Q.	Please state your name.	
11	A.	Daniel F. Miller.	
12			
13	Q.	For whom are you employed?	
14	A.	I am employed by Local 702, International Brotherhood of Electrical Workers, AFL-CIO	
15	("IBEW Local 702") as a full-time Business Representative. I have been employed by them		
16	since January 28, 1991. I have been an IBEW Local 702 member since August 1972.		
17			
18	Q.	What are your responsibilities as a Business Representative?	
19	A.	I have several responsibilities. First, I negotiate labor contracts with AmerenCIPS and	
20	other	entities that IBEW Local 702 contracts with. As part that duty, I have to understand the	
21	exact	job duties and functions of the membership I represent. Second, I administer the contract	
22	including processing and settlement of grievances.		

23				
24	Q.	Where is the main office of IBEW Local 702?		
25	A.	Local 702's main office is located at 106 North Monroe Street, West Frankfort, Illinois		
26	62896	5.		
27				
28	Q.	Does the IBEW Local 702 have collective bargaining agreements with Ameren-IP		
29	and other Ameren Companies?			
30	A.	Yes, IBEW Local 702 has a collective bargaining agreement, and other written		
31	agreements, memorandums, fringe benefit plans, and documents with AmerenCIPS. We also			
32	have agreements with Illinois Power Company d/b/a AmerenIP and Mt. Carmel Public Utility.			
33	These agreements and other documents cover the wages, fringe benefits, and terms and			
34	conditions of employment of employees, including employees performing work in the areas of			
35	electric transmission line construction and maintenance.			
36				
37	Q.	Before working for IBEW Local 702, for whom were you employed?		
38	A.	I was employed by AmerenCIPS from 1972 to 1991.		
39				
40	Q.	In what positions were you employed with AmerenCIPS?		
41	A.	I was employed as a gas helper, apprentice tree trimmer, apprentice lineman, and		
42	journe	eyman lineman (referred generally below as a "lineman").		
43				
44	Q.	How long were you employed as an apprentice lineman and lineman?		

I was employed as an apprentice lineman and lineman from 1976 to 1991.

45

A.

- 47 Q. As a lineman, did your job duties include the construction and maintenance of
- 48 electric transmission lines?
- 49 A. Yes.

50

- 51 Q. What is your understanding as to the purpose and scope of this proceeding?
- 52 A. It is my understanding that the purpose and scope of this proceeding is determine whether
- or not the Commission should approve the joint petition filed by AmerenIP and Ameren Illinois
- Transmission Company ("Ameren Transco") to, among other things, construct, operate, and
- maintain three new 345 kilovolt ("kV") electric lines and related facilities in Monroe, Randolph,
- 56 St. Clair, and Washington Counties, Illinois, and issue a certificate to Ameren Transco to operate
- as a public utility.

58

- 59 Q. What is the purpose of your direct testimony?
- 60 A. The purpose of my testimony is address issues regarding the personnel that AmerenIP
- and Ameren Transco will use to actually construct, operate, and maintain the proposed electric
- transmission lines and related facilities set forth in its Amended Petition.

63

- 64 Q. Do IBEW Local 702 members employed by AmerenIP typically perform the actual
- 65 construction and maintenance of electric transmission lines for AmerenIP?
- 66 A. Yes. I would add that IBEW Local 309 members are also employed by AmerenIP to
- 67 perform the same work in parts of Monroe, Randolph, St. Clair, and Washington Counties,
- 68 Illinois. IBEW Local 309 has a collective bargaining agreement and other written agreements

with AmerenIP that cover the wages, fringe benefits, and terms and conditions of employment of 69 employees, including employees performing work in the areas of electric transmission line 70 construction and maintenance. 71 72 73 Q. What is the job classification for AmerenIP personnel who perform the construction and maintenance of electric transmission lines in its service territory? 74 AmerenIP has one job classification for personnel performing the construction and 75 A. maintenance of electric transmission lines: journeyman lineman. 76 77 78 Q. What are a lineman's responsibilities? 79 A lineman is responsible for the installation, construction, and maintenance of all A. 80 overhead and underground transmission and distribution circuits and lines, including performing 81 storm restoration work, for AmerenIP. Part of a lineman's duties includes the installation, maintenance, and restoration of line and service extensions provided to residential and non 82 83 residential customers. A lineman is also obligated to trouble shoot the causes of service outages 84 to customers. 85 What training and experience do linemen have to perform their duties? 86 Q. 87 A. To become a lineman in AmerenIP service territory, a person must successfully complete 88 an apprenticeship program that consists of several years of classroom and on the job training. 89 The apprenticeship program covers all of the proper work practices, electrical theory, safety, 90 tools and equipment that an apprentice needs to master before becoming a journeyman lineman. 91

Q. Has AmerenIP or Ameren Transco provided any details in their filings that describe
the personnel who will actually construct, operate, and maintain the proposed electric
transmission lines and related facilities?

A. No. Nowhere in petition, amended petition or direct testimony filed by the joint petitioners is there any information describing the personnel who will be actually constructing, operating, and maintaining the proposed electric transmission lines and related facilities. For example, the joint petitioners have not explained: (1) whether the proposed electric transmission lines and facilities will be constructed, maintained or operated by IBEW linemen employed by AmerenIP or its affiliates; (2) whether the joint petitioners or Ameren Services Company will utilize the services of one or more contractors to construct, maintain or operate those transmission lines and facilities; or (3) the present level of skills, training, and experience of the personnel that the joint petitioners, Ameren Services Company or their respective contractors will use to construct, maintain or operate those transmission lines and facilities.

All that has been disclosed is that AmerenIP and Ameren Transco "will have responsibility for the construction and day to day operation" of these transmissions lines and related facilities, and a promise that they will ensure that these lines and facilities are "constructed in accordance with all applicable federal state regulations and orders of the Illinois Commerce Commission, including 83 Ill. Admin. Code part 305, and the National Electric Safety Code." Joint Amended Pet. at 4, 9. The Amended Petition further states, however, that AmerenIP and Ameren Transco will appoint Ameren Services Company to serve as the entity that will actually manage and supervise the construction of these lines and facilities and be the entity responsible for their operation. Id. at 14.

115	Q.	Based on this lack of information, what is your opinion regarding whether the	
116	Com	nission should approve AmerenIP and Ameren Transco's Amended Petition?	
117	A.	I conclude that since the record does not currently contain any information regarding the	
118	identity, skills, qualifications, training and experience of the personnel that will be used to		
119	actual	ly construct, operate, and maintain the proposed electric transmission lines and related	
120	facilities the Commission lacks a sufficient basis to approve the Amended Petition. It is		
121	incumbent upon AmerenIP and Ameren Transco to (1) disclose to the Commission exactly who		
122	will be constructing, operating, and maintaining these transmission lines and facilities, and (2)		
123	demonstrate to the Commission that the personnel doing such work have the skills, training and		
124	experience to do the job correctly so that system reliability and public and worker safety are not		
125	placed in jeopardy. Without such information, it is difficult to see how the Commission can		
126	make an informed decision in this proceeding.		
127			
128	Q.	Has the IBEW sought answers to the questions you have raised in your testimony?	
129	A.	Yes, the IBEW recently sent AmerenIP and Ameren Transco data requests requesting	
130	information regarding these questions. We look forward to AmerenIP and Ameren Transco's		
131	responses to our data requests before making a final recommendation to the Commission.		
132			
133	Q.	Does this conclude your testimony?	
134	A.	Yes.	

STATE OF ILLINOIS ILLINOIS COMMERCE COMMISSION

ILLINOIS POWER COMPANY d/b/a)	
AmerenIP, and	
AMEREN ILLINOIS TRANSMISSION)	Docket No. 06-0179
COMPANY	
Petition for (i) a Certificate of Public)	
Convenience, pursuant to Section 8-406(a) of the)	
Public Utilities Act; (ii) a Certificate of Public)	
Convenience and Necessity, pursuant to Section)	
8-406 of the Public Utilities Act, authorizing	
Construction, operation and maintenance of new)	
345,000 volt electric lines in Monroe, Randolph,	
St. Clair, and Washington Counties, Illinois;)	
(iii) an order pursuant to Section 8-503 of the	
Public Utilities Act approving construction of)	
New transmission facilities; (iv) approval of an)	
Agreement between affiliated interests; and	
(v) other relief as may be necessary	

NOTICE OF FILING

Please take notice that on July 13, 2006, I caused to be filed with the Chief Clerk of the Illinois Commerce Commission, Elizabeth Rolando, 527 East Capitol Avenue, Springfield, IL 62701 the enclosed Direct Testimony of Daniel F. Miller on behalf of Local Unions 51, 309, 649, 702 and 1306 of the International Brotherhood of Electrical Workers, AFL-CIO in the above-captioned proceeding.

Eric M. Madiar

Attorney for Local Unions 51, 309, 649, 702 and 1306 International Brotherhood of Electrical Workers, AFL-CIO

CERTIFICATE OF SERVICE

Please take note that on July 13, 2006, I, Eric M. Madiar, hereby certify that I did file with the Illinois Commerce Commission the foregoing Direct Testimony and electronically served the same upon the persons identified on the docket's service list. In addition, I hereby certify that I did serve the same on the persons identified on the docket's service list via U.S. regular mail who are not accepting service through electronic means.

Eric M. Madiar

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